

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

KAYLA WEST,	)	
	)	
Plaintiff,	)	
	)	Civil Action File
v.	)	No. 1:15-CV-0397-AT
	)	
DJ MORTGAGE, LLC,	)	
	)	
Defendant	)	

**MOTION TO STAY PRE-ANSWER DEADLINES PENDING FINAL  
DISPOSITION OF DEFENDANT’S MOTION TO DISMISS**

Pursuant to Northern District of Georgia Civil Local Rule 26, Defendant DJ Mortgage, LLC (“Defendant”) moves to stay all pre-answer deadlines in the above-captioned civil action—including, without limitation, the deadlines to make initial disclosures, to conduct an early planning conference pursuant to Federal Rule of Civil Procedure 26(f) and Northern District of Georgia Civil Local Rule 16.1, and to complete a Joint Preliminary Report and Discovery Plan—pending a final disposition of the *Motion to Dismiss* filed by Defendant herewith.

As set forth in the *Memorandum of Law in Support of Defendant’s Motion to Stay Pre-Answer Deadlines* filed herewith, this Court has broad discretion to control the timing of discovery and other deadlines in this action, and any efforts to comply with otherwise applicable pre-answer deadlines while Defendant’s *Motion to Dismiss* remains pending would be unduly burdensome, as the costs of meeting

such deadlines would outweigh any benefit should the *Complaint* be dismissed, as Defendant has requested. For those reasons, this motion should be granted, and all otherwise applicable pre-answer deadlines should be stayed in this action pending a final disposition of Defendant's *Motion to Dismiss*.

This the 7th day of April, 2015.

/s/ John A. Christy

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**CERTIFICATE OF SERVICE**

This certifies that I have, this day, electronically filed the foregoing *Motion to Stay Pre-Answer Deadlines Pending Final Disposition of Defendant's Motion to Dismiss* with the Clerk of Court using the CM/ECF electronic filing system, as mandated by Northern District of Georgia Civil Local Rule 5.1(A) and as approved by Standing Order No. 04-01 of this Court, which will automatically send e-mail notification of such filing to all attorneys of record.

This the 7th day of April, 2015.

/s/ Andrew J. Lavoie

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